


Case # P52948/MGB
RE: Steven Laino
Docket #: 08 CR 413-01 (JSR)

TO COUNSEL AND / OR DEFENDANT

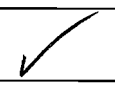
Please indicate on the bottom of this form your agreement with or objection to the facts as submitted in the report. Those specific parts of the report to which you object should be listed thereafter.

7/24/08
DATE REVIEWED


COUNSEL (Defense or Government)

DEFENDANT (if present)

COMMENTS

_____	I decline to comment on the report at this time.
_____	I concur with the facts as submitted in the report.
	I object to certain information in the report. (Please list below)

Please use the back of this form or additional pages if you need more space.

FORM 456A

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July 29, 2008

VIA ECF and Regular Mail

Senior P.O. Michele G. Bambrick
Department of Probation, SDNY
500 Pearl Street
New York, NY 10007

Re: Case # P52948/MGB; Steven Laino
Docket No. 08 CR 413-01 (JSR)

Dear Sr. P.O. Bambrick:

Please accept this letter as constituting our objections to the Pre-Sentence Investigation Report prepared in the above-entitled matter. As you will see, these objections are mostly in the form of clarifications or additions.

Page 3, para. 2: The vehicle Mr. Laino used on the night of his arrest belongs to his fiancée, Christine Press. Ms. Press, who is disabled as a result of the events of September 11, 2001, did not, in any way, authorize this transaction nor have any knowledge of it. The Government has not made a claim of forfeiture against the automobile (which would be a devastating blow to a family desperately trying to regain its financial footing).

Page 5, para. 5: In addition to, or as a result of, Mr. Laino's "excellent" adjustment to community-based supervision, his Pre-Trial Services officer has informed him that he no longer must make weekly calls and Thursday visits. He must report only when his "color" is called.

Page 5, para. 10: The conversation is accurately reported. However, any implication that Mr. Laino kept the \$200.00 is untrue. A search of his person revealed no such quantity of money, and Mr. Laino maintains (and the government does not dispute), that he ever made money from his transactions. He was paid solely in drugs to feed his addiction. In addition, it should be noted that Mr. Laino attempted further cooperation by asking the arresting officers whether they wanted him to contact "Pat" to arrange another meeting and drug exchange, which they could witness.

In the same area of attempted cooperation, Mr. Laino was fully debriefed by AUSA Benjamin Naftalis. He provided full, candid, and complete answers to all

questions posed, and offered to cooperate in any way that the Government would find useful. I believe that the Government will corroborate the fact that, from the moment of the stop to date, Mr. Laino has attempted to cooperate and has provided full and complete information. He followed the DEA agent's instructions completely.

Page 8, para. 33: Mr. Laino's sister, Linda, recently underwent major surgery for colon cancer. She has moved from New Hampshire to be closer to Steven, and he is assisting in her care. The surgery, its complications, and his renewed commitment to her all took place after his arrest. Mr. Laino has assumed additional and unforeseen family responsibilities since his arrest.

Page 8, para. 35: Out of love for his son, and perhaps an attempt to salvage his own remaining pride, Mr. Laino never informed his son about his current arrest. It is his hope that he never has to, or will do so at some far future date. He is remarkably close to his son; seeing him regularly and speaking to him twice a day. It is the one relationship that his drug addiction has not destroyed.

Page 13, para. 63: Mr. Laino's taxes for 2007 were reduced to \$213.86 if he pays by August 4, 2008, which he intends to do. This was an "incentive reduction." Documentation is attached.

Mr. Laino currently owes \$1,567.30 for tax year 2006. (Documentation attached).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Kuby', with a long horizontal flourish extending to the right.

Ronald L. Kuby

cc: AUSA Julian Moore



Department of the Treasury
Internal Revenue Service
Andover, MA 05501-0010

For assistance, call:
1-800-829-0922
Your Caller ID: 737630
Notice Number: CP22A
Date: July 14, 2008

050695.465614.0230.005 1 AV 0.324 765
|||||.....|||...||..|||..||..||..||..||..||..||..||..||..||..||

Taxpayer Identification Number:

Tax Form: 1040.

Tax Year: December 31, 2007

STEVEN S LAINO
39 STUYVESANT AVE
STATEN ISLAND NY 10312-3721398

**Amount You Owe
as of August 4, 2008**

\$213.86

We Changed Your Account

16221-171-02591-8

We will explain why you received this notice, how we changed your account, how this change affects you, and actions you may wish to take.

Why You Received This Notice

We applied a credit to your 2007 tax account due to new legislation. We used (offset) all or part of your economic stimulus payment to pay your federal tax as the law allows. We will send another notice to you if we make this offset to other amounts you owe.

How We Changed Your Account

We changed your account as follows:

Account balance before this change	\$813.08	Due
Credit added other	\$600.00	CR
Interest charged	\$.78	
Amount you now owe	\$213.86	

How This Affects You

Please pay the full amount by August 4, 2008 to avoid additional penalty and interest. When making your payment:

- Make your check or money order payable to the **United States Treasury**
- Write the Social Security number and tax year shown at the top of this notice on the check or money order
- Use the payment coupon included with this notice

If you cannot pay the balance in full, contact an IRS representative at 1-800-829-0922 to discuss payment options. If you've recently contacted us to include this amount in an installment agreement or have already paid it in full, disregard this payment request.

10312

IRS USE ONLY

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Department of the Treasury
Internal Revenue Service
Andover, MA 05501-0010

For assistance, call:
1-800-829-0922
Your Caller ID: 737630
Notice Number: CP14
Date: July 21, 2008

078825.467471.0266.007 2 AT 0.471 1619

10312-3721398

Taxpayer Identification Number:

Tax Form: 1040A

Tax Year: December 31, 2006

STEVEN S LAINO
39 STUYVESANT AVE
STATEN ISLAND NY 10312-3721398

Amount You Owe
as of August 11, 2008

\$1,567.30

According to our records, you have an amount due on your income tax. Please compare your tax return against the figures below. If you've already paid your tax in full or arranged for an installment agreement, please disregard this notice.

Your 2006 Tax Record	
Description	On Your Return
Total Tax On Return	\$3,444.00
Less:	
Tax Withheld	\$2,314.00-
Estimated Payments	\$.00
Other Credits	\$30.00-
Other Payments	\$.00
Total Payments & Credits	\$2,344.00-
Underpaid Tax	\$1,100.00
Penalty	\$360.00
Interest	\$107.30
Total Amount You Owe	\$1,567.30+

If we receive your payment by August 11, 2008, we will not charge additional penalty and interest.

If you agree please:

- Make the check payable to "United States Treasury."
- Write your Taxpayer Identification Number on your check.
- Use the enclosed envelope.
- Include the tear off stub at the end of this notice and make sure the IRS address shows through the window.

If you disagree please:

- Call the customer service number above.
- Have your Taxpayer Identification Number available.
- If you wish to discuss a payment that you made by check, have the information from the front and back of your cancelled check available.